

Joshi Deepak

From: DeLisi John
Sent: Wednesday, March 02, 2005 3:49 PM
To: Warren Scott; Joshi Deepak
Subject: NPRM

AOPA To NTSB: Reconsider Additional Pilot Reporting Requirements

No Sir, They Don't Like It

AOPA is objecting to a proposed change in NTSB regulations that the association says would place an unnecessary reporting burden on general aviation pilots.

The NTSB wants a mandatory report from pilots whenever there is "a loss of information from the majority of an aircraft's electronic primary displays."

"Too broad, too general," said Luis Gutierrez, AOPA director of regulatory and certification policy. "The NTSB failed to define 'majority' and 'electronic primary display.' That may lead to pilots being forced to report electronic display malfunctions that are inconsequential to the safe operation of the aircraft."

In comments to the NTSB, Gutierrez cited the case of a pilot flying in VFR conditions who experiences a failure of the aircraft's primary navigation display - the GPS. Under the proposed rule, the pilot would have to report that. Yet safety was never compromised; the pilot simply reverted to an alternate means of navigation, consistent with the pilot's training.

For pilots flying aircraft with TCAS (traffic collision avoidance system), the NTSB also wants a report every time the TCAS issues a "resolution advisory" (a command to change course or altitude to avoid another transponder-equipped aircraft) when flying on an IFR flight plan. "The requirement is duplicative and unnecessary because the FAA already records incidents involving loss of separation," said Gutierrez.

"AOPA requests that the NTSB reevaluate and weigh its need for information against the administrative burden placed on pilots from these requirements," AOPA told the agency.

FMI: www.aopa.org